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USDC SDNY

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X	DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/30/2022
UNITED STATES OF AMERICA,	: :	
-V-	· :	
	:	20-cr-110 (LJL)
LAWRENCE RAY,	:	
	:	<u>ORDER</u>
Defendant.	:	
	:	
	X	

LEWIS J. LIMAN, United States District Judge:

The parties are invited to include discussion of the following issue in the letter briefs due at 11:00 p.m. tonight: Assuming that the proffer by the defense is not sufficient to give rise to an advice of counsel defense on any of the charges, is it nonetheless relevant to the intent component of the tax evasion charge and, on the assumption that it is relevant only to intent and only on those counts, what limiting instructions should be given to the jury.

SO ORDERED.

Dated: March 30, 2022

New York, New York

LEWIS J. LIMAN United States District Judge